

**REMARKS**

This Amendment is being filed in response to the Office Action dated March 11, 2008. Claims 1, 2, 4-14, 16, 18, 20-24, 26-32, and 34-54 are currently pending, of which claims 1, 11, 20, 31, 41, 44, and 47 are independent. Claims 3, 15, 17, 19, 25, and 33 were previously canceled.

Claims 1, 2, 8-11, 20, 31, 41-44, 46, 47, and 49 have been amended, and claims 52-54 have been added to better claim the invention.

The Specification has been amended to correct minor typographical errors.

**I. Examiner Interview Summary**

Applicant thanks the Examiner for the courtesy of the telephone interview conducted on May 13, 2008. During the interview, the cited references and the claims were discussed.

**II. Summary of Claim Rejections**

In the Office Action:

- 1) claims 1-2, 5-10, 31, 34-40, and 41-43 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,829,759 to Davis et al. (hereinafter “Davis”);
- 2) claim 4 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Davis in view of U.S. Pre-Grant Publication No. 2003/0023755 to Harris et al. (hereinafter “Harris”);
- 3) claims 11-14, 16, and 44-46 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Davis;
- 4) claims 18, 32, and 50-51 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Davis in view of “Towards Portable Source Code Representations Using XML” by Mamas et al. (hereinafter “Mamas”);

- 5) claims 20-21, 23, 26-29, and 47-49 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Davis in view of U.S. Patent No. 5,507,030 to Sites (hereinafter “Sites”);
- 6) claim 22 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Davis in view of Sites and in further view of Official Notice;
- 7) claim 24 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Davis in view of Sites and in further view of U.S. Patent No. 5,797,011 to Kroll et al. (hereinafter “Kroll”); and
- 8) claim 30 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Davis in view of Sites and in further view of Mamas.

### **III. 35 U.S.C. § 102(e) rejections based on Davis**

In the Office Action, claims 1-2, 5-10, 31, 34-40, and 41-43 were rejected under 35 U.S.C. § 102(e) as being anticipated by Davis (Office Action, page 4). Applicant respectfully traverses this rejection.

#### **A. Claims 1 and 41**

Applicant respectfully urges that Davis fails to disclose at least the following features of claims 1 and 41: *searching a plurality of cross-references in an output description to identify a second cross-reference that matches the first cross-reference, the second cross-reference being associated with a segment in the output description that corresponds to the segment in the input description.*

Davis does not disclose that a plurality of cross-references are searched in order to identify the second cross-reference that matches the first cross-reference. In addition, Davis does not disclose that the cross-references that are searched are in the output description. Thus, Davis does not disclose *searching a plurality of cross-references in an output description to identify a second cross-reference that matches the first cross-reference, the second cross-*

*reference being associated with a segment in the output description that corresponds to the segment in the input description.*

For at least the reasons set forth above, Applicant respectfully urges that Davis does not disclose each and every feature of claims 1 and 41. Therefore, Applicant respectfully requests that the above 35 U.S.C. § 102(e) rejections of claims 1 and 41 be withdrawn.

**B. Claims 2, 5-10, and 42-43**

Claims 2 and 5-10 depend on and incorporate all of the features of claim 1. Claims 43-43 depend on and incorporate all of the features of claim 41. Accordingly, Applicant respectfully urges that claims 2, 5-10 and 42-43 are allowable for at least the same reasons as set forth above with respect to claims 1 and 41, respectively. Therefore, Applicant respectfully requests that the above 35 U.S.C. § 102(e) rejections of claims 2, 5-10, and 42-43 be withdrawn.

**C. Claim 31**

Applicant respectfully urges that Davis fails to disclose at least the following features of claim 31: *search a plurality of cross-references in the output code to identify a second cross-reference that matches the first cross-reference, the second cross-reference being associated with a segment in the output code that corresponds to the segment in the input code.* As discussed above with respect to claims 1 and 41, Davis fails to disclose that a plurality of cross-references are searched in order to identify the second cross-reference that matches the first cross-reference. In addition, Davis does not disclose that the cross-references that are searched are in the output code.

For at least the reasons set forth above, Applicant respectfully urges that Davis does not disclose each and every feature of claim 31. Therefore, Applicant respectfully requests that the above 35 U.S.C. § 102(e) rejection of claim 31 be withdrawn.

**D. Claims 34-40**

Claims 34-40 depend on and incorporate all of the features of claim 31. Accordingly, Applicant respectfully urges that claims 34-40 are allowable for at least the same reasons as set

forth above with respect to claim 31. Therefore, Applicant respectfully requests that the above 35 U.S.C. § 102(e) rejections of claims 34-40 be withdrawn.

#### **IV. 35 U.S.C. § 103(a) rejections**

##### **A. Claim 4**

In the Office Action, claim 4 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Davis in view of Harris (Office Action, pages 9-10). Applicant respectfully urges that Davis and Harris, taken either singly or in any reasonable combination, do not disclose or suggest all of the features of claim 4.

Claim 4 depends on claim 1. As noted above, Davis fails to disclose or suggest various features of claim 1. For example as noted above with respect to claim 1, Davis fails to disclose or suggest at least *searching a plurality of cross-references in an output description to identify a second cross-reference that matches the first cross-reference, the second cross-reference being associated with a segment in the output description that corresponds to the segment in the input description*. Since these features are also present in claim 4, Davis also fails to disclose or suggest these features in claim 4.

Applicant respectfully urges that the teachings of Harris do not supplement Davis in such a way as to cure Davis' failure to disclose or suggest the above features. For example, Harris fails to disclose or suggest at least *searching a plurality of cross-references in an output description to identify a second cross-reference that matches the first cross-reference, the second cross-reference being associated with a segment in the output description that corresponds to the segment in the input description*, which is present in claim 1.

Since claim 4 depends on and incorporates all of the features of claim 1, Harris does not disclose or suggest at least these features in claim 4. Thus, Harris does not cure the shortcomings of Davis with respect to claim 4, and Applicant respectfully urges that Davis and Harris, taken either singly or in any reasonable combination, do not disclose or suggest all of the features of claim 4.

Accordingly, Applicant respectfully requests that the above 35 U.S.C. § 103(a) rejection of claim 4 be withdrawn.

**B. Claims 11-14, 16, and 44-46**

In the Office Action, claims 11-14, 16, and 44-46 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Davis (Office Action, page 10). Applicant respectfully traverses this rejection.

**i. Claims 11 and 44**

Applicant respectfully urges that Davis fails to disclose or suggest at least the following features of claim 11: *searching a plurality of cross-references in the second description to identify a second cross-reference that matches the first cross-reference, the second cross-reference being associated with a second element in the second description that corresponds to the first element*, and the following features of claim 44: *searching a plurality of cross-references in the output description to identify a second cross-reference that matches the first cross-reference, the second cross-reference being associated with a second element in the output description that corresponds to the first element*. As discussed above with respect to claims 1 and 41, Davis fails to disclose or suggest that a plurality of cross-references are searched in order to identify the second cross-reference that matches the first cross-reference. In addition, Davis does not disclose or suggest that the cross-references that are searched are in a second description or an output description.

For at least the reasons set forth above, Applicant respectfully urges that Davis does not disclose or suggest all of the features of claims 11 and 44. Therefore, Applicant respectfully requests that the above 35 U.S.C. § 103(a) rejections of claims 11 and 44 be withdrawn.

**ii. Claims 12-14, 16, and 45-46**

Claims 12-14 and 16 depend on and incorporate all of the features of claim 11. Claims 45-46 depend on and incorporate all of the features of claim 44. Accordingly, Applicant respectfully urges that claims 12-14 and 16 are allowable for at least the same reasons as set

forth above with respect to claims 11 and 44. Therefore, Applicant respectfully requests that the above 35 U.S.C. § 103(a) rejections of claims 12-14, 16, and 45-46 be withdrawn.

**C. Claims 18, 32, and 50-51**

In the Office Action, claims 18, 32, and 50-51 were rejected under 35 U.S.C. 103(a) as being unpatentable over Davis in view of Mamas. Applicant respectfully urges that Davis and Mamas, taken either singly or in any reasonable combination, do not disclose or suggest all of the features of claims 18, 32, and 50-51.

Claim 18 depends on and incorporates all of the features of claim 11. Claim 32 depends on and incorporates all of the features of claim 31. Claim 50 depends on and incorporates all of the features of claim 1. Claim 51 depends on and incorporates all of the features of claim 41. As noted above, Davis fails to disclose or suggest various features of base claims 11, 31, 1, and 41. For example, Davis fails to disclose or suggest that a plurality of cross-references are searched in order to identify the second cross-reference that matches the first cross-reference. In addition, Davis does not disclose or suggest that the cross-references that are searched are in the output description. Since the features in claims 11, 31, 1, and 41 are also present in claims 18, 32, 50, and 51, respectively, Davis also fails to disclose or suggest these features in claims 18, 32, 50, and 51.

Applicant respectfully urges that the teachings of Mamas do not supplement Davis in such a way as to cure Davis' failure to disclose or suggest the above features. For example, Mamas fails to disclose or suggest *searching a plurality of cross-references in the second description to identify a second cross-reference that matches the first cross-reference, the second cross-reference being associated with a second element in the second description that corresponds to the first element*, recited in claim 18; *a processor configured to search a plurality of cross-references in the output code to identify a second cross-reference that matches the first cross-reference, the second cross-reference being associated with a segment in the output code that corresponds to the segment in the input code*, recited in claim 32; or *searching a plurality of cross-references in an output description to identify a second cross-reference that matches the first cross-reference, the second cross-reference being associated with a segment in the output*

*description that corresponds to the segment in the input description*, recited in claims 50 and 51. Thus, Mamas does not cure the shortcomings of Davis with respect to claims 18, 32, 50, and 51.

For at least the reasons set forth above, Applicant respectfully urges that Davis and Mamas, taken either singly or in any reasonable combination, do not disclose or suggest all of the features of claims 18, 32, 50, and 51. Therefore, Applicant respectfully requests that the above 35 U.S.C. § 103(a) rejection of claims 18, 32, 50, and 51 be withdrawn.

**D. Claims 20-21, 23, 26-29 and 47-49**

In the Office Action, claims 20-21, 23, 26-29 and 47-49 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Davis in view of Sites. Applicant respectfully traverses these rejections.

**i. Claims 20 and 47**

Applicant respectfully urges that Davis and Sites, taken either singly or in any reasonable combination, fail to disclose or suggest at least the following feature of claims 20 and 47: *connecting a portion in the first segment and a corresponding portion in the second segment through a connection line to indicate that the connected portions in the first and second segments correspond to each other, the portion in the first segment being a subset of the first segment, the portion in the second segment being a subset of the second segment and the correspondence indicating that the portion in the first segment is a translation of the portion in the second segment.*

The Examiner alleges that a connection line would be “an obvious alternate method of indicating the association between Davis’ input an[d] output descriptions” (Office Action, page 18). Applicant respectfully urges that doing so would not address all of the features of claims 20 and 47. In claims 20 and 47, there is a first *segment* and a second *segment* that correspond to each other. Their correspondence may be indicated in many ways, including highlighting (claim 21) and background coloring (claim 22). Claims 20 and 47 further recite that the correspondence of *portions within the segments* may be indicated by connection lines, where *portions* are *subsets of segments*. Davis discloses that “corresponding groups of elements are aligned” (Davis, col. 6, lines 54-56) (emphasis added). Substituting the alignment with

connection lines, as the Examiner suggests, fails to disclose or suggest that the correspondence of *segments* and the correspondence of *portions within those segments* would be indicated at the same time in different ways because Davis' group "does not require the related source instruction elements 422 and translation instruction elements 426 be adjacent to or horizontally aligned with each other" (Davis, col. 16, lines 50-60).

Applicant claims indicating at least two level of correspondence: 1) the correspondence between a first segment and a second segment and 2) the correspondence between a portion in the first segment and a portion in the second segment. Sites discloses one correspondence: using a line to connect "the block 210 at the beginning of the procedure to the block 213 where the uninstantiated variable was first used" (Sites, col. 24, lines 11-13). Furthermore, the connection line in Sites does not connect blocks that are translations of each other. Thus, Sites does not disclose or suggest *selecting or marking a first segment and a second segment that correspond to each other, the correspondence indicating that the second segment is a translation of the first segment* and *connecting a portion in the first segment and a corresponding portion in the second segment through a connection line to indicate that the connected portions in the first and second segments correspond to each other, the portion in the first segment being a subset of the first segment, the portion in the second segment being a subset of the second segment and the correspondence indicating that the portion in the first segment is a translation of the portion in the second segment*, as recited in claims 20 and 47.

For at least the reasons set forth above, Applicant respectfully urges that Davis and Sites, taken either singly or in any reasonable combination, do not disclose or suggest all of the features of claims 20 and 47. Therefore, Applicant respectfully requests that the above 35 U.S.C. § 103(a) rejection of claims 20 and 47 be withdrawn.

**ii. Claims 21, 23, 26-29 and 48-49**

Claims 21, 23 and 26-29 depend on and incorporate all of the features of claim 20. Claims 48-49 depend on and incorporate all of the features of claim 47. Accordingly, Applicant respectfully urges that claims 21, 23, 26-29 and 48-49 are allowable for at least the same reasons as set forth above for claims 20 and 47. Therefore, Applicant respectfully requests that the above 35 U.S.C. § 103(a) rejections of claims 21, 23, 26-29 and 48-49 be withdrawn.



**E. Claim 22**

In the Office Action, claim 22 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Davis in view of Sites and in further view of Official Notice. As noted above, Davis and Sites, taken either singly or in any reasonable combination, fail to disclose or suggest all of the features of claim 20. For example, Davis and Sites fail to disclose or suggest *at least connecting a portion in the first segment and a corresponding portion in the second segment through a connection line to indicate that the connected portions in the first and second segments correspond to each other, the portion in the first segment being a subset of the first segment, the portion in the second segment being a subset of the second segment and the correspondence indicating that the portion in the first segment is a translation of the portion in the second segment*. Applicant respectfully urges that the Official Notice does not supplement Davis and Sites in such a way as to cure Davis and Sites' failure to disclose or suggest the above features.

Claim 22 depends on and incorporates all of the features of claim 20. Since, as discussed above, Davis, Sites, and the Examiner's Official Notice fail to disclose or suggest all of the features of claim 20, Davis, Sites, and the Examiner's Official Notice also fail to disclose or suggest all of the features of claim 22.

For at least the reasons set forth above, Applicant respectfully urges that Davis, Sites and the Official Notice, taken either singly or in any reasonable combination, do not disclose or suggest all of the features of claim 22. Therefore, Applicant respectfully requests that the above 35 U.S.C. § 103(a) rejection of claim 22 be withdrawn.

**F. Claim 24**

In the Office Action, claim 24 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Davis in view of Sites and in further view of Kroll. As noted above, Davis and Sites, taken either singly or in any reasonable combination, fail to disclose or suggest all of the features of claim 23. For example, Davis and Sites fail to disclose or suggest *connecting a portion in the first segment and a corresponding portion in the second segment through a connection line to indicate that the connected portions in the first and second segments*

*correspond to each other, the portion in the first segment being a subset of the first segment, the portion in the second segment being a subset of the second segment and the correspondence indicating that the portion in the first segment is a translation of the portion in the second segment.* Applicant respectfully urges that Kroll does not supplement Davis and Sites in such a way as to cure Davis and Sites' failure to disclose or suggest the above features.

Claim 24 depends on and incorporates all of the features of claim 23. Since, as discussed above, Davis, Sites, and Kroll fail to disclose or suggest all of the features of claim 23, Davis, Sites and Kroll also fail to disclose or suggest all of the features of claim 24.

Furthermore, Applicant respectfully urges that Davis, Sites and Kroll, taken either singly or in any reasonable combination, also fail to disclose or suggest the following feature of claim 24: *the plurality of lines is highlighted in different colors.* As discussed above, Davis and Sites do not disclose or suggest that connection lines may be used to indicate the correspondence of *portions within segments, the correspondence indicating that the portion in the first segment is a translation of the portion in the second segment.* Kroll discloses that color may be used to distinguish between tasks that need to be completed (parts that still need translation) and tasks that have already been completed (parts that have already been translated) (Kroll, col. 6, line 67 to col. 7, line 4), however, Kroll does not disclose or suggest that color may be used to indicate the *correspondence* from original source to translated source.

For at least the reasons set forth above, Applicant respectfully urges that Davis, Sites and Kroll, taken either singly or in any reasonable combination, do not disclose or suggest all of the features of claim 24. Therefore, Applicant respectfully requests that the above 35 U.S.C. § 103(a) rejection of claim 24 be withdrawn.

#### **G. Claim 30**

In the Office Action, claim 30 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Davis in view of Sites and in further view of Mamas. As noted above, Davis and Sites, taken either singly or in any reasonable combination, fail to disclose or suggest all of the features of claim 26. For example, Davis and Sites fail to disclose or suggest at least *connecting a portion in the first segment and a corresponding portion in the second segment*

*through a connection line to indicate that the connected portions in the first and second segments correspond to each other, the portion in the first segment being a subset of the first segment, the portion in the second segment being a subset of the second segment and the correspondence indicating that the portion in the first segment is a translation of the portion in the second segment.* Applicant respectfully urges that Mamas does not supplement Davis and Sites in such a way as to cure Davis and Sites' failure to disclose or suggest the above features.

Claim 30 depends on and incorporates all of the features of claim 26. Since, as discussed above, Davis, Sites, and Mamas fail to disclose or suggest all of the features of claim 26, Davis, Sites, and Mamas fail to disclose or suggest all of the features of claim 30.

For at least the reasons set forth above, Applicant respectfully urges that Davis, Sites and Mamas, taken either singly or in any reasonable combination, do not disclose or suggest all of the features of claim 30. Therefore, Applicant respectfully requests that the above 35 U.S.C. § 103(a) rejection of claim 30 be withdrawn.

#### **V. Newly Added Claim 52**

Applicant has added claim 52. Claim 52 depends on and incorporates all of the features of claim 1. Accordingly, Applicant respectfully urges that claim 52 is allowable for at least the same reasons as set forth above with respect to claim 1.

Furthermore, Applicant respectfully urges that the cited references fail to disclose or suggest the following feature of claim 52: *the first cross-reference is in the input description.*

For at least the reasons set forth above, Applicant respectfully urges allowance of claim 52.

#### **VI. Newly Added Claims 53 and 54**

Applicant has added claims 53 and 54. Claims 53 and 54 depend on and incorporate all of the features of claim 11. Therefore, claims 53 and 54 are allowable for at least the same reasons as set forth above with respect to claim 11. Accordingly, Applicant respectfully urges allowance of claims 53 and 54.

**VII. Conclusion**

In view of the above amendments and arguments, Applicant believes the pending application is in condition for allowance. Should the Examiner feel that a teleconference would expedite the prosecution of this application, the Examiner is urged to contact the Applicant's attorney at (617) 227-7400.

Please charge any shortage or credit any overpayment of fees to our Deposit Account No. 12-0080, under Order No. MWS-095RCE. In the event that a petition for an extension of time is required to be submitted herewith, and the requisite petition does not accompany this response, the undersigned hereby petitions under 37 C.F.R. §1.136(a) for an extension of time for as many months as are required to render this submission timely. Any fee due is authorized to be charged to the aforementioned Deposit Account.

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Respectfully submitted,

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